

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
GTE CORPORATION,)
)
Transferor,)
)
and)
)
BELL ATLANTIC CORPORATION,)
)
Transferee,)
)
For Consent to Transfer Control.)

CC Docket No. 98-184

Reply Comments of

National Hispanic Council on Aging
Child Health Foundation
Latin American Women and Supporters
Telecommunications Advocacy Project
Federation of Hispanic Organizations of the Baltimore Metropolitan Area, Inc.

December 23, 1998

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The undersigned organizations¹ have reviewed the November 23, 1998 filing by Keep America Connected and welcome the opportunity to submit comments in support of this filing and the Bell Atlantic and GTE merger. We are requesting that the Commission add our names to the comments of and views expressed by Keep America Connected.

We represent diverse and varied constituencies that believe that further competition among telecommunications services providers will benefit consumers. We have joined together in our support of this merger since we believe it will further and expand competition across the spectrum of telecommunications services.

We believe that the merger will provide further needed competition in the telecommunications services marketplace. This new competition will lead to the expansion of the current and the addition of new telecommunications services and products being marketed to consumers at affordable prices. The merger will also enable the new company to use its expanded size and resources to provide these services to consumers on a national basis. We also encourage the Commission to ensure that all consumers served by the new company have access to these services and products.

In their filing with the Commission, Keep America Connected presented the consumer issues that this merger must address, i.e., universal service; best practices; competition in the local, long distance, and wireless markets; and the need for advanced telecommunications services for all Americans.

We are encouraged by Bell Atlantic and GTE's statements that the merger will enable them to provide one-stop shopping to consumers by providing bundled services in and outside of their existing service areas. The new company must make these services available to all consumers, including those living in high-cost or underserved areas.

¹ See Appendix for the Statement of Interests of each organization and its interests.

Through this merger the new Bell Atlantic and GTE will work towards the Act's goal of providing universal service to all Americans.

We also encourage Bell Atlantic and GTE to incorporate the best practices of each company into the basic values of the new company. These best practices must not only include the best businesses practices exemplified in each company. We agree with Keep America Connected that the new company must look closely at their best practices, respectively, in the areas of diversity, accessibility, and consumer education/protection. The best customer and community outreach practices of each company should become an intrinsic part of the corporate culture, philosophy and organization of the new company.

The new company's pledge to enter into direct competition in the local, long distance and wireless markets will create new avenues of competition to the benefit of the consuming public. We are hopeful that the new company's commitment to enter into local telephone service markets outside their existing service areas will promote broad scale competition in furtherance of the vision of the 1996 Act. Consumers will benefit from this competition by having more choices in local telephone services, enabling them to use their telecommunication's dollars more effectively.

Bell Atlantic and GTE have also stated that they will expand the GTE long distance service footprint to provide long distance service on a truly national scale. They have committed to becoming a top tier provider of long distance services, in direct competition with AT&T, MCI/WorldCom, and Sprint. Further competition in the long distance market will benefit consumers.

Direct competition in local and long distance services is necessary and needed. Consumers need competitive local and long distance services environments in which

companies become more responsive to their customers and provide such services at lower prices to consumers.

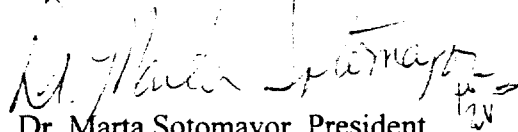
We are also encouraged by the new company's commitment to become a national provider of wireless services. Further competition in this dynamic and growing market will only increase competitive pressures to provide current and new wireless services at lower prices to the benefit of consumers. Further, a national wireless provider can provide telecommunications services in areas that do not currently have access to such services, including rural and other underserved communities.

Lastly, we believe that the new company must provide advanced telecommunications services to all consumers within its service area. We also have concerns that many areas of this nation do not have access to advanced telecommunications services. Bell Atlantic and GTE have stated that they will expand the Internet backbone capabilities of GTE to become a major national competitor for Internet services. We believe that the new company must use this expanded backbone to provide advanced telecommunications services to areas not currently served or underserved.

We support the views expressed in the Keep America Connected filing. We believe this merger is in the public interest and will further fulfill the goals of the Telecommunications Act of 1996.

We believe this merger will enable the new company to foster the vision and goals of the 1996 Act by creating new competitive structures across a broad range of telecommunications markets. The approval of this merger is, therefore, in the national interest and is supported by the undersigned organizations.

Respectfully submitted.

A handwritten signature in dark ink, appearing to read "Dr. Marta Sotomayor", with a stylized flourish at the end.

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Appendix

Statement of Interests

National Hispanic Council on Aging is a membership organization that promotes the well being of Hispanic elderly. Members represent fields of administration, planning, direct services, research and education.

Child Health Foundation was established in 1985 as a non-profit, public charity to prevent and treat life-threatening communicable diseases of infants and children in the United States and abroad. Their mission is "to save the greatest number of children's lives at the lowest possible cost." We accomplish this through our unique network of health professionals and organizations committed to improving health policies and practices. We operate as an independent agent of change, seeking and promoting more effective, easily delivered and less-expensive methods to prevent illness and death of children. We focus on prevention and treatment of dehydration from diarrheal diseases, which debilitate and kill millions of infants and children worldwide every year.

Latin American Women and Supporters works to improve and promote information to Latin American women and their families through education. This organization supports efforts to ensure that Latin American women have access to new telecommunications technologies and services for education, jobs, and economic development opportunities.

Telecommunications Advocacy Project purpose is to create affordable gateways for minority participation in the telecommunications marketplace. This organization focuses on legislation, procurement opportunities, and educates rulemakers about the need to include minority-owned businesses in the building the information highway.

Federation of Hispanic Organizations of the Baltimore Metropolitan Area, Inc is a non-profit organization comprised of Baltimore are Hispanic non-profit organizations which works to promote cultural, educational and socio-economic interests in the Hispanic community, including issues pertaining to community based technology networks.